

ORIGINAL

MR. JEFFERY ALONZO SIMMS #198625
(PLAINTIFF) v.

(DEFENDANTS)

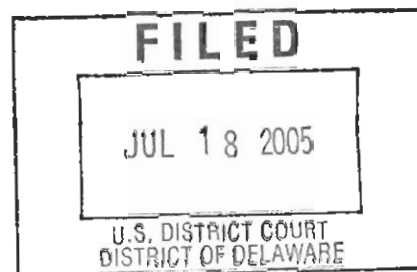
MAJOR (RET.) R.L. HUGHES; LT. COL. (MAJOR -
THOMAS F. MACLEISH) AND COL. L. AARON CHAFFINCH
(DEFENDANTS) MR. HARRY M. FREEMAN M.D. Ph.D;
ORTHOPEDIC SURGEON 808 MIDDLEFORD
ROAD SEAFORD DELAWARE 19973 (302-629-5501

(DEFENDANTS) MS. DONNA BURNS M.D. Ph.D
(WORK PLACE) DEPARTMENT OF CORRECTION;
P.O. BOX 500 GEORGETOWN, DELAWARE
(INSURANCE COMPANY CNN) 19947

(DEFENDANTS) MAJOR (RET.) R.L. HUGHES: MAJOR;
NOW THOMAS F. MACLEISH OF DELAWARE STATE
POLICE P.O. BOX 430 DOVER DELAWARE 19903

CIVIL ACTION NO: 04-941-SLR
CIVIL ACTION NO: 04-1205-SLR
DATE JULY 14-2005

(FILE DATE SEPTEMBER 9-8-2004)



NOTICE OF MOTION
FOR EMERGENCY HEARING OR TRIAL AT THE EARLIEST POSSIBLE
CONVENIENCE DATE. (ACTION MOTION TO PROCEED)

TO; THE HONORABLE JUDGE SUE L. ROBINSON AND UNITED STATES DISTRICT
COURT CLERK MR. PETER T. DALLEO: (EXHIBIT 1,2,3, and a,b,c,) DELAWARE LOCAL RULES 1,2,3,4,5,
U.S. DISTRICT ANNOTE 35 7B

1) a. PLEASE BE ADVISED, THE PLAINTIFF A PPO se, IN THE ABOVE
CAPTION CIVIL CASE MOTION FOR TRIAL EFFECTIVELY AND DEMAND SUBPOENA OF
THE DEFENDANTS IN THE CIVIL ACTION CASE.

2) b. ALSO BE ADVISED, THE PLAINTIFF SEEK A COURT ORDER FROM THE
HONORABLE SUE L. ROBINSON AND CLERK OF COURT MR. PETER T. DALLEO U.S.D.C.W.D.
OF ANY FURTHER DENIAL OF MEDICAL TREATMENT AN IMPROPRIETY AGAINST
THE PLAINTIFF WHILE AT (MR. JEFFERY ALONZO SIMMS #198625 DELAWARE
CORRECTIONAL CENTER 1181 PADDOCK ROAD SMYRNA DELAWARE 19977..

3) d. FURTHERMORE MAY IT PLEASE THE COURT THE PLAINTIFF RELEASE COPIES
OF THE CLAIMS OF STATEMENT AND MOTION TO THE SUPERIOR COURT SUSSEX
COUNTY DELAWARE SUITE 2 GEORGETOWN 19947 THE HONORABLE JUDGE (RICHARD F.
STOKES AND CLERK OF THE SUPERIOR COURT AND HERETO THE COURT WILL FIND
FIND THE CERTIFICATE OF SERVICE :

HERE COMES THE PPO SE MR. JEFFERY ALONZO SIMMS 198625
TO THE HONORABLE JUDGE SUE L. ROBINSON AND CLERK MR. PETER T. DALLEO
OF THE UNITED STATES DISTRICT COURT WILMINGTON (I AWAIT YOUR RESPONDS
EFFECTIVELY AND URGENTLY AND I REMAIN SINCERLY.

SIGNATURE OF MOVANT DATE JULY 14, 2005

CIVIL ACTION NO. 04-1205 SLR
AND CIVIL ACTION NO. 04-941 -SLR

DATE JULY 14 2005

CERTIFICATE OF SERVICE

I:JEFFERY ALONZO SIMMS #1986257, HEREBY CERTIFY THAT I HAVE SENT THREW
THE UNITED STATES POSTAL SERVICE THE FOREGOING DOCUMENTS AND CONTACT
THREW COMMUNICATIONS THE CLERK OF THE UNITED STATES COURT DISTRICT OF
DELAWARE ON THE ABOUT DAY 14 YEAR 2005 2005

AND CERTIFY Y THAT COFYS WERE SENT THE FOLLOWING:

MR. RALH K. DURSTEIN 111
DEPARTMENT OF JUSTICE
820 N. FRENCH STREET 6th floor
WILMINGTON DELAWARE 19801

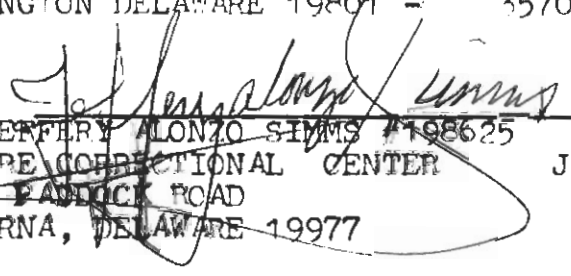
HONORABLE JUDGE RICHARD F. STOKES
SUSSEX COUNTY COURTHOUSE
1THE CIRCLE
GEORGETOWN, DELAWARE 19947
THE HONORABLE JUDGE SUE L. ROBINSON

PROTHONOTARYS OFFICE
1 THE CIRCLE # SUITE 2
GEORGETOWN DELAWARE 19947

AND CLERK THE UNITED STATES DISTRICT COURT
844 N. KING STREET LOCK BOX 18
WILMINGTON DELAWARE 19801 - 3570

DEPUTY ATTORNETY

DEPUTY ATTORNEY GENERAL
MS. MELANIE WITHERS
114 E. MARKET STREET
GEORGETOWN, DELAWARE 19947


MR. JEFFERY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

JULY 14 2005